

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BENEZET CONSULTING, LLC; and, TRENTON POOL	:	
	:	
PLAINTIFFS,	:	CIVIL ACTION
	:	
vs.	:	No. 1:16-CV-00074
	:	Hon. Yvette Kane
	:	
PEDRO A. CORTÉS, in his official capacity as the Secretary of the Commonwealth of Pennsylvania; and JONATHAN MARKS, in his official capacity as Commissioner, of the Bureau of Commissions, Elections and Legislation	:	<i>Filed Electronically</i>
	:	
DEFENDANTS.	:	

**AMENDED COMPLAINT
FOR DECLARATORY AND INJUNCTIVE RELIEF**

Plaintiffs, BENEZET CONSULTING LLC and TRENTON POOL, by and through their undersigned legal counsel, file this action for prospective equitable relief against Defendants, PEDRO A. CORTÉS, in his official capacity as Secretary of the Commonwealth and JONATHAN MARKS, in his official capacity as Commissioner for the Bureau of Commissions, elections and Legislation, and the state official with direct supervision of the Pennsylvania Bureau of Elections, and allege, based on information and belief, as follows:

his own as a direct and proximate result of the challenged provision of 25 P.S. §2869, for the sole reason that he is not a “qualified elector” of the Commonwealth of Pennsylvania. Accordingly, Plaintiff Pool is not able to maximize his ability to spread Rand Paul’s message as a direct and proximate result of 25 P.S. §2869, because any effort and time he spends circulating Rand Paul’s nomination petitions in Pennsylvania must, by force of law, be tethered to another volunteer in the same geographic locality thereby minimizing his ability to expand the reach of Rand Paul’s message and the pool of “qualified electors” exposed to Rand Paul’s political message in the Commonwealth of Pennsylvania.

Plaintiff Trenton Pool is willing to sign an affidavit, or any other paper, placing himself within and consenting to the jurisdiction of Pennsylvania judicial officials with respect to any investigative and/or judicial procedure seeking to investigate and prosecute violations of Pennsylvania election law.

21. Plaintiff Benezet Consulting LLC is a Limited Liability Company registered in the State of Texas with a principal place of business at 506 West 15th Street, Suite 201, Austin Texas (hereinafter “Benezet”). Plaintiff Benezet is engaged in the business of circulating nomination petitions for Republican candidates, including candidates for President of the United States. Plaintiff Benezet contracts with candidates to circulate election petitions to secure access to state primary and general election ballots by charging a flat “per signature fee”